

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 6:24-CR-125
	§	
MARK MAZZARE, M.D.	§	

ELEMENTS OF THE OFFENSE

Defendant **Mark Mazzare, M.D.**, is charged in Count One of the Information with a violation of 18 U.S.C. § 371 (42 U.S.C. § 1320a-7b(b)(4)) (Conspiracy to Defraud the United States and to Purchase Medicare Beneficiary Identification Numbers). The elements of the offense are as follows:

1. That the defendant and at least one other person agreed to commit the crime of defrauding the United States and purchasing Medicare Beneficiary Identification Numbers, as charged in the Information;
2. That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
3. That at least one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the Information, in order to accomplish some object or purpose of the conspiracy.

Respectfully submitted,

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CHIEF, FRAUD SECTION

/s/ Brynn A. Schiess

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served by electronic mail to counsel of record, Louis Leichter, by way of the Court's CM/ECF on December 2, 2024.

/s/ Robert Austin Wells

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Assistant United States Attorney